

Discussion of Possible Revisions to the 10 General Preconditions

October 2012

Overview of this Report

At the September 2012 Commission meeting staff presented an item about the Commission's Preconditions (<http://www.ctc.ca.gov/commission/agendas/2012-09/2012-09-2B.pdf>) requesting direction to move forward in updating the current Preconditions. The current adopted Preconditions are provided in Appendix C of this agenda item. This agenda item provides information on the Commission's discussion of this topic and presents draft General Preconditions for the Commission's discussion.

Staff Recommendation

Staff recommends that the COA discuss the draft Preconditions and suggest edits or amendments. Staff would then seek stakeholder feedback from the TAP panel and other stakeholders prior to presenting changes to the Commission for its consideration and possible adoption.

Background

The Commission's ten General Preconditions serve as one important gatekeeper to ensure that only those institutions with the capacity to offer high quality educator preparation programs will be approved to prepare educators in California. The current set of General Preconditions was adopted nearly two decades ago, although the Preconditions have been altered on an ad hoc basis through the years. On occasion, the COA has had discussions about the Commission's General Preconditions and whether they are appropriate and adequate to serve their purpose. . Most recently, at the April 2012 meeting (<http://www.ctc.ca.gov/educator-prep/coa-agendas/2012-04/2012-04-item-13.pdf>) the COA took action to recommend two changes to the current set of General Preconditions. These recommendations related to 1) language about a change in status of an institution of higher education's regional accreditation and 2) the importance of a clear grievance process. Both of these topics are not currently embodied in the current set of Preconditions and the COA agreed that they ought to be included in future iterations of the Preconditions.

The Commission discussed its ten General Preconditions at the September 2012 meeting and a variety of areas where staff suggested the Preconditions would benefit from modification. Provided below is a summary of the proposed modifications. The full text of the proposed, revised Preconditions is provided in Appendix A of this agenda item.

Table 1: Summary of the Proposed Modifications	
Adopted Precondition	Proposed Modification
(1) Accreditation and Academic Credit	(1) Accreditation and Academic Credit <ul style="list-style-type: none">• Reorganized language to clarify requirements for both IHEs and other sponsors• Added requirement for notification of change in regional accreditation
(2) Responsibility and Authority	(2) Responsibility and Authority (No change)

Table 1: Summary of the Proposed Modifications	
Adopted Precondition	Proposed Modification
(3) Personnel Decisions	(3) Discrimination <ul style="list-style-type: none"> Changed title to reflect the concept in the Precondition Removed the specific example of gender
(4) Demonstration of Need	Moved to <i>Program Specific Preconditions</i>
(5) Practitioners' Participation in Program Design	
(6) Commission Assurances	(4) Commission Assurances <ul style="list-style-type: none"> Removed reference to within 4 years Clarified (c) to be the Commission's accreditation system
(7) Requests for Data	(5) Requests for Data (No change)
(8) Faculty Participation	(8) Faculty Participation <ul style="list-style-type: none"> Clarified that postsecondary faculty for all teaching credentials and administrative services credentials must have experience in the public schools every three years.
(9) California Basic Educational Skills Test	Moved to <i>Program Specific Preconditions</i>
(10) Certificate of Clearance	

Staff suggests that the following four Preconditions be added to the Commission's General Preconditions.

Table 2: Proposed New Preconditions	
Title of Proposed Precondition	Purpose of the Precondition
(6) Veracity in all Claims and Documentation Submitted	Makes all institutions aware that claims and documentation submitted to the Commission must be truthful. If claims or documentation are shown to be false, it is cause to deny initial institutional approval or for the COA to place stipulations on the institution.
(7) Grievance Process	Requires each institution to have a grievance process, that applicants and candidates are aware of the grievance process, and that the process is followed when a grievance has been filed.
(9) Prior to a Candidate Beginning Work in the Schools	Clarify for all institutions and all programs sponsored by the institution that, prior to a candidate beginning to teach or provide a service in the public schools, the candidate must have taken CBEST or satisfied the Basic Skills Requirement and hold a Certificate of Clearance from the Commission.
(10) Prior to Program Approval	Notifies all institutions that there are specific requirements that must be met prior to program approval including the Demonstration of Need for the program and Practitioner Participation in the Design of the Program.

Charter Schools

The Commission staff also raised the issue of charter schools and whether any specific considerations need to be given to this sector of the education community. Charter schools are exempt from many of the state laws and regulations and yet are eligible to offer educator preparation programs. The Commission staff suggests that language be considered to ensure the same expectations for all educator preparation programs regardless of the entity providing the services. It would be helpful if the COA could suggest language that would address this issue.

Process

The Commission expressed general support for the suggested changes proposed by staff and presented in this item. In addition, two stakeholders expressed support for the effort. Credential Counselors and Analysts of California (CCAC) voiced support for the changes and encouraged the Commission to consider providing an institution's preconditions to an accreditation team. Currently, staff reviews the preconditions and they are not provided to the review teams. Additionally, the California School Boards Association voiced support for the effort and encouraged the Commission to consider specific precondition language related to charter schools as educator preparation program sponsors.

Commissioners directed the staff to continue with the review of the General Preconditions. However, they were concerned that no review panel would be appointed to review the proposed preconditions prior to the Preconditions being returned to the Commission for review and possible adoption. To address this and still be responsive to an environment of limited resources, a suggestion was made that the Teacher Preparation Advisory (TAP) Panel could review the preconditions.

Program Specific Preconditions

Appendix B provides the language of the four Preconditions that could be added to the program-specific Preconditions. If the concepts addressed in the four current Preconditions presented below were to be removed from the General Preconditions, the content of these Preconditions would need to be added to the sets of program Preconditions.

- (4) Demonstration of Need
- (5) Practitioners' Participation in Program Design
- (9) California Basic Educational Skills Test
- (10) Certificate of Clearance

Next Steps

After the COA discusses and provides feedback on the proposed revised Preconditions, staff will share the draft Preconditions with the TAP Panel and bring back an agenda item to the Commission.

Appendix A

Proposed Revised Preconditions

General Preconditions for All Professional Preparation Programs

The following Preconditions apply to all educator preparation programs. All institutions applying for initial institutional approval or continuing accreditation of their educator preparation programs must respond to the following Preconditions.

Pursuant to Education Code Section 44227 (and 44265) each institution must respond to the general preconditions as well as all other applicable program specific preconditions.

General Preconditions Established by the Commission

(1) Accreditation and Academic Credit. To be granted initial institutional accreditation or continuing accreditation by the Committee on Accreditation, the program(s) must be proposed and operated by

(a) **Institutions of higher education:** a college or university that (i) is fully accredited by the Western Association of Schools and Colleges or another of the six regional accrediting associations, and (ii) grants baccalaureate academic credit or post baccalaureate academic credit, or both and (iii) *an institution approved to offer educator preparation in California must notify the Commission within 30 days if its regional accreditation status changes.* (This provision does not apply to professional preparation programs offered by school districts or other sponsors.)

(b) **School districts or other non-regionally accredited entities:** the Superintendent or CEO of the district or entity shall submit verification of the governing board's approval of sponsorship of the program. The agreement to sponsor a program must include verification of the following:

Once a candidate is accepted and enrolls in an educator preparation program, the sponsor must offer the approved program, meeting the adopted standards, until the candidate:

- i) completes the program;
- ii) withdraws from the program;
- iii) is dropped from the program based on established criteria; or
- iv) is admitted to another approved program to complete the requirements, with minimal disruption, for the authorization in the event the program closes. In this event, an individual transition plan would need to be developed with each candidate.

(2) Responsibility and Authority. To be granted initial institutional accreditation or continuing accreditation by the Committee on Accreditation, the entity shall provide the following information:

- (a) Identify the position within the organizational structure that is responsible for ongoing oversight of all educator preparation programs offered by the entity (including educator preparation programs offered by an extension division, if any).
 - (b) Provide a description of the reporting relationship between the position described in (a) and the individual(s) who coordinate each educator preparation program offered by the entity. If a reporting relationship is indirect, describe the levels of authority and responsibility for each educator preparation program.
- (3) Discrimination.** To be granted initial institutional accreditation or continuing accreditation by the Committee on Accreditation, a program of professional preparation must be proposed and operated by an entity that makes all personnel decisions without unlawful discrimination. These decisions include decisions regarding the admission, retention or graduation of students, and decisions regarding the employment, retention or promotion of employees.
- (4) Commission Assurances.** To be granted initial institutional accreditation or continuing accreditation by the Committee on Accreditation, the program proposal must: (a) demonstrate that the program will fulfill all of the applicable standards of program quality and effectiveness that have been adopted by the Commission, (b) assure that the sponsor will cooperate in an evaluation of the program by an external team or a monitoring of the program by a Commission staff member, and (c) assure that the sponsor will *participate fully in the Commission's accreditation system*.
- (5) Requests for Data.** To be granted initial institutional accreditation or continuing accreditation by the Committee on Accreditation, the entity must identify a qualified officer responsible for reporting and respond to all requests from the Commission for data including, but not limited to, program enrollments, program completers, examination results, and state and federal reporting within the time limits specified by the Commission.
- (6) Veracity in all Claims and Documentation Submitted.** To be granted initial institutional accreditation or continuing accreditation by the Committee on Accreditation, the entity must positively affirm the veracity of all statements and documentation submitted to the Commission. Evidence of a lack of veracity is cause for denial of initial institutional accreditation or for stipulations from the Committee on Accreditation
- (7) Grievance Process:** To be granted initial institutional accreditation or continuing accreditation by the Committee on Accreditation, the sponsor *must have a clearly delineated grievance process for candidates and applicants. The grievance process information must be accessible to all candidates and applicants and the institution must be prepared to provide documentation that the candidate has been informed of the grievance process and that it has been followed.*
- (8) Faculty Participation.** Each postsecondary faculty member who regularly teaches one or more courses relating to instructional methods for teaching credentials, or Administrative Services credentials, shall actively participate in public elementary or secondary schools and classrooms at least once every three academic years. *Reference: Education Code Section 44227.5 (a) and (b).*

- (9) Prior to a Candidate Beginning Work in the Schools.** An institution which operates an approved preparation program shall:
- a. Require applicants for program admission to take the California Basic Educational Skills Test (CBEST) or have satisfied the Basic Skills Requirement (BSR).
 - b. Not allow a candidate to work in the schools until the candidate obtains a Certificate of Clearance from the Commission.
- (10) Prior to Program Approval.** To be granted initial program accreditation or continuing accreditation by the Committee on Accreditation, the entity must confirm that there are program-specific Preconditions that must be met including preconditions for initial program approval (Demonstration of Need and Practitioner Participation in Program Design).

Appendix B

Program Specific Preconditions

These Preconditions could be added to the appropriate sets of program specific Preconditions. Preconditions 11 and 12 would be added to every set of program specific preconditions. Preconditions 13 and 14 would be added to all initial preparation programs but not to the second tier preparation programs.

- (11) Demonstration of Need.** To be granted initial program accreditation by the Committee on Accreditation, the program proposal must include a demonstration of the need for the program in the region in which it will operate. Such a demonstration must include, but need not be limited to, assurance by a sample of school administrators that one or more school districts will, during the foreseeable future, hire or assign additional personnel to serve in the credential category.
- (12) Practitioners' Participation in Program Design.** To be granted initial program accreditation by the Committee on Accreditation, the program proposal must include verification that practitioners in the credential category have participated actively in the design and development of the program's philosophical orientation, educational goals, and content emphases.
- (13) Basic Skills Requirement.** In each program of professional preparation, applicants for program admission shall be required to take the California Basic Educational Skills Test (CBEST) or have satisfied the Basic Skills Requirement (BSR). The institution shall use the test results to ensure that, upon admission, each candidate receives appropriate academic assistance necessary to pass the examination. *Reference: Education Code Sections 44252 (f) and 44225 (n).*

For Internship Programs: In each internship program of professional preparation, candidates who are admitted shall be required to satisfy the Basic Skills Requirement prior to assuming intern teaching responsibilities. *Reference: Education Code Section 44252 (b).*

Clarification of General Precondition 13

Legislative Intent. General Precondition 13 does not require passage of the CBEST for admission, only that the examination be taken. It is the intent of the Legislature that admission to a program not be denied solely on the basis of having failed to pass the CBEST. Further, it is expected that institutions will make provisions for assisting candidates in passing the exam.

Applicants Residing Out of State When They Apply for Admission. Persons residing outside of California when they apply for admission must take the CBEST no later than the second available administration of the test after enrolling in the program.

Candidate Qualifications. The standard requires that Preliminary Credential candidates must satisfy the BSR prior to daily student teaching.

(14) Certificate of Clearance. An entity that operates a program of professional preparation shall not allow a candidate to assume daily student teaching or services responsibilities until the candidate obtains a Certificate of Clearance from the Commission that verifies the candidate's personal identification, unless the individual has already completed the fingerprint and character identification process and has been issued a valid document by the Commission. *Reference: Education Code Section 44320 (d).*

For Internship Programs: A Certificate of Clearance must be obtained prior to assuming intern teaching responsibilities, intern counseling or psychologist responsibilities.

Appendix C

Adopted Preconditions

General Preconditions for All Professional Preparation Programs

Pursuant to Education Code Section 44227 (and 44265) each institution must respond to the ten general preconditions as well as all other applicable program specific preconditions.

The following Preconditions apply to all professional preparation programs. All institutions applying for initial institutional approval or continuing accreditation of their educator preparation programs must respond to the following 10 Preconditions.

General Preconditions Established by the Commission

(1) Accreditation and Academic Credit. To be granted initial institutional accreditation by the Commission to become eligible to submit programs or to be granted initial program accreditation or continuing accreditation by the Committee on Accreditation, the program(s) must be proposed and operated by a college or university that (a) is fully accredited by the Western Association of Schools and Colleges or another of the six regional accrediting associations, and (b) grants baccalaureate academic credit or post baccalaureate academic credit, or both. (This provision does not apply to professional preparation programs offered by school districts.)

For school districts or other non-regionally accredited entities wishing to offer an educator preparation program, the Superintendent or CEO of the district or entity shall submit verification of the governing board's approval of sponsorship of the program. The agreement to sponsor a program must include verification of the following:

Once a candidate is accepted and enrolls in an educator preparation program, the sponsor must offer the approved program, meeting the adopted standards, until the candidate:

- i) completes the program;
- ii) withdraws from the program;
- iii) is dropped from the program based on established criteria; or
- iv) is admitted to another approved program to complete the requirements, with minimal disruption, for the authorization in the event the program closes. In this event, an individual transition plan would need to be developed with each candidate.

(2) Responsibility and Authority. To be granted initial institutional/district accreditation by the Commission or initial program accreditation or continuing accreditation by the Committee on Accreditation, the institution/district shall provide the following information:

(a) Identify the position within the organizational structure that is responsible for ongoing oversight of all credential preparation programs offered by the institution/district (including credential programs offered by the extension division, if any).

(b) Provide a description of the reporting relationship between the position described in (a) and the individuals who coordinate each credential program offered by the institution/district. If a reporting relationship is indirect, describe the levels of authority and responsibility for each credential program.

(3) Personnel Decisions. To be granted initial program accreditation or continuing accreditation by the Committee on Accreditation, a program of professional preparation must be proposed and operated by an institution/district that makes all personnel decisions without considering differences due to gender or other constitutionally or legally prohibited considerations. These decisions include decisions regarding the admission, retention or graduation of students, and decisions regarding the employment, retention or promotion of employees.

(4) Demonstration of Need. To be granted initial program accreditation by the Committee on Accreditation, the program proposal must include a demonstration of the need for the program in the region in which it will be operated. Such a demonstration must include, but need not be limited to, assurance by a sample of school administrators that one or more school districts will, during the foreseeable future, hire or assign additional personnel to serve in the credential category.

(5) Practitioners' Participation in Program Design. To be granted initial program accreditation by the Committee on Accreditation, the program proposal must include verification that practitioners in the credential category have participated actively in the design and development of the program's philosophical orientation, educational goals, and content emphases.

(6) Commission Assurances. To be granted initial program accreditation by the Committee on Accreditation, the program proposal must (a) demonstrate that the program will fulfill all of the applicable standards of program quality and effectiveness that have been adopted by the Commission; (b) assure that the institution/district will cooperate in an evaluation of the program by an external team or a monitoring of the program by a Commission staff member within four years of the initial enrollment of candidates in the program; and (c) assure that the institution/district will participate in focused reviews of one or more aspects of the program when designated by the Commission.

(7) Requests for Data. To be granted initial or continuing accreditation by the Committee on Accreditation, the institution/district must identify a qualified officer responsible for reporting and respond to all requests from the Commission for data including, but not limited to, program enrollments, program completers, examination results, and state and federal reporting within the time limits specified by the Commission.

General Preconditions Established by State Law

(8) Faculty Participation. Each postsecondary faculty member who regularly teaches one or more courses relating to instructional methods in a college or university program of professional preparation for teaching credentials, including Specialist Credentials, or one or more courses in administrative methods in an Administrative Services Credential program, shall actively participate in public elementary or secondary schools and classrooms at least once every three academic years. *Reference: Education Code Section 44227.5 (a) and (b).*

(9) California Basic Educational Skills Test. In each program of professional preparation, applicants for program admission shall be required to take the California Basic Educational Skills Test (CBEST). The institution shall use the test results to ensure that, upon admission, each candidate receives appropriate academic assistance necessary to pass the examination. *Reference: Education Code Sections 44252 (f) and 44225 (n).*

For Internship Programs: In each internship program of professional preparation, candidates who are admitted shall be required to pass the California Basic Educational Skills Test prior to assuming intern teaching responsibilities. *Reference: Education Code Section 44252 (b).*

Clarification of General Precondition 9

Legislative Intent. General Precondition 9 does not require passage of the CBEST for admission, only that the examination be taken. It is the intent of the Legislature that admission to a program not be denied solely on the basis of having failed to pass the CBEST. Further, it is expected that institutions will make provisions for assisting candidates in passing the exam.

Applicants Residing Out of State When They Apply for Admission. Persons residing outside of California when they apply for admission must take the CBEST no later than the second available administration of the test after enrolling in the program.

Candidate Qualifications. The standard requires that Multiple and Single Subject Credential (Program Standard 17) candidates must pass the CBEST prior to daily student teaching.

(10) Certificate of Clearance. A college or university that operates a program of professional preparation shall not allow a candidate to assume daily student teaching responsibilities until the candidate obtains a Certificate of Clearance from the Commission that verifies the candidate's personal identification, unless the individual has already completed the fingerprint and character identification process and has been issued a valid document by the Commission. *Reference: Education Code Section 44320 (d).*

For Internship Programs: A Certificate of Clearance must be obtained prior to assuming intern teaching responsibilities, intern counseling or psychologist responsibilities.